

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Hearing Aid Compatibility Requirements)	WT Docket No. 06-203
For Wireless Telecommunications)	
Devices)	
)	

To: The Wireless Telecommunications Bureau

Reply Comments of Iowa Wireless Services, LLC dba i wireless

The Wireless Telecommunications Bureau has requested comments on its upcoming report to the Commission regarding the requirement that by February 18, 2008, all wireless carriers must ensure that at least 50% of all handsets offered meet at least an ANSI C63.19 M3 rating¹. Iowa Wireless Services, LLC d/b/a i wireless hereby files these comments in response to this request.

i wireless is a local Personal Communications Services ("PCS") provider in Iowa and western Illinois. i wireless utilizes GSM technology throughout its PCS network and operates exclusively in the 1900 MHz band. i wireless offers only dual-band 1900 MHz and 850 MHz handsets. Dual band handsets allow our customers to access the networks of our roaming partners that operate in the 850 MHz and 1900 MHz bands.

i wireless supports the comments of the Alliance for Telecommunications Industry Solutions (ATIS) filed January 12, 2007. The ATIS comments provide a

¹ DA 06-2285 released November 8, 2006

detailed analysis of the technical challenges and the unintended consequences of meeting the 50% requirement.

Progress to date in achieving GSM HAC compliant handsets² indicates the manufacturing industry faces difficult challenges in developing sufficient compliant handsets so that GSM wireless carriers can meet the February 18, 2008 deadline. Of specific concern to small GSM carriers like i wireless is the availability of GSM HAC compliant dual-band handsets.

Currently there are few HAC compliant GSM dual-band phones available. As a tier 3 wireless carrier, i wireless has had difficulty meeting the current requirement to have two HAC compliant models in inventory. If there are a limited number of HAC compliant handsets available, it is unlikely they will be made available to Tier III carriers in a sufficient number to meet the Commissions deadline.

As detailed in the ATIS comments, the technical problems specific to GSM is forcing manufacturers to a clam-shell type design to achieve HAC compliance.³ ATIS details how the 50% requirement will limit the choices of wireless handsets for GSM customers.⁴

The 50 percent requirement will have disproportionate adverse effects on GSM carriers and even greater consequences for small GSM carriers. GSM carriers will have fewer HAC compliant models than CDMA carriers and therefore will be competitively disadvantaged⁵. Small GSM carries will be even

² Comments of ATIS filed 1/12/2007 in WT Docket No. 06-203, pg 15 ¶ B

³ ATIS comments pg 21 ¶ C

⁴ id pg 32

⁵ Comments of Cingular Wireless LLC, pgs 7,8

further disadvantaged because of the size of their inventory. It is not economically feasible for small carriers to have available a large inventory selection. A small GSM carrier that must have 50% of its inventory in a particular model or design of handset will be extremely disadvantaged competitively.

i wireless is concerned that the 50% rule will adversely affect the ability of GSM carriers to compete in the market place. i wireless asks that the FCC consider reducing or postponing the 50% rule until the technical problems addressed in the ATIS comments have been resolved.

Respectfully submitted,

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